

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Caption in Compliance with D.N.J. LBR 9004-1(b)

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Company, Yankee Gas Services Company,
Public Service Company of New Hampshire,
Consolidated Edison Company of New York,
Inc., Orange and Rockland Utilities, Inc.,
PECO Energy Company, The Potomac Electric
Power Company, Delmarva Power & Light
Company, Atlantic City Electric Company,
Potomac Edison Company, Jersey Central
Power & Light Company, Boston Gas
Company, KeySpan Energy Delivery Long
Island, KeySpan Energy Delivery New York,
Massachusetts Electric Company, Public
Service Electric and Gas Company and
Baltimore Gas and Electric Company*

In re:

MODELL'S SPORTING GOODS,
INC., *et al.*,

Debtors.

Chapter 11

Case No. 20-14179 (VFP)

Jointly Administered

Honorable Vincent F. Papalia

**DECLARATION OF VICKI PIAZZI OF NATIONAL GRID IN SUPPORT OF RESPONSE
OF CERTAIN UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING
THE DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Vicki Piazzzi, declare as follows:

1. I am a Lead Analyst, US Shared Services Credit and Collections for National Grid, and I have been a Lead Analyst for 5 years and with National Grid for 30 years. In my current position with National Grid, I assist in the credit and bankruptcy operations of the following operating companies: Boston Gas Company (“BGE”) and Massachusetts Electric Company (“MEC”) (collectively, “National Grid”).

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of National Grid’s business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of National Grid. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of National Grid, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors’ Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the “Response”).

4. In making this Declaration, I am familiar with the contents of the Response.

5. It is part of my job responsibility with National Grid to: (A) review customer accounts with National Grid; (B) address credit issues with National Grid’s customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit “A” is a chart reflecting (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. Exhibit “A” reflects that (i) BGE issued 2 post-petition invoices to the Debtors

totaling \$1,314.90, and (ii) MEC issued one post-petition invoice to the Debtors in the amount of \$194.53.

8. National Grid has not received payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true and correct to the best of my knowledge, information, and belief.

Executed this 22nd day of April 2020, at Syracuse, New York.



Vicki Piazza

| Service Address | | Post-Petition Account # (last 4) | Invoice date | Service period | Bill amount | NG Entity |
|-----------------|--------------|-------------------------------------|--------------|-------------------|-------------|---------------------------|
| 632 FELLSWAY | MED MA 21550 | 4013 | 4/9/2020 | 3/11/20 - 3/17/20 | \$318.89 | Boston Gas |
| N/A | | | | | | |
| 188 NEEDHAM ST | NEW MA 24640 | 2562 | 4/15/2020 | 3/11/20-4/9/20 | \$996.01 | Boston Gas |
| S110R | | | | | | |
| 650 FELLSWAY | MEDFORD MA | 0011 | 4/13/2020 | 3/11/20-3/16/20 | \$194.53 | Boston Gas |
| | | | | | | Massachusetts Elec |
| | | | | | | Massachusetts Elec |

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| Kate R. Buck James A. Kellar McCARTER & ENGLISH, LLP 100 Mulberry Street Newark, New Jersey 07102 (973) 622-4444 kbuck@mccarter.com , jkellar@mccarter.com | |
| <i>Counsel for NStar Electric Company, Eastern Massachusetts, Connecticut Light & Power Company, Yankee Gas Services Company, Public Service Company of New Hampshire, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i> | |
| In re: MODELL'S SPORTING GOODS, INC., et al., Debtors. | Chapter 11 Case No. 20-14179 (VFP) Jointly Administered Honorable Vincent F. Papalia |

DECLARATION OF JENNIFER WOehrLE OF ORANGE AND ROCKLAND
UTILITIES, INC. IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305

I, Jennifer Woehrle declare as follows:

1. I am a Senior Analyst for Orange and Rockland Utilities, Inc. ("ORU") and I have been with ORU for 14 years, 10 months. In my current position with ORU, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of ORU's business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of ORU. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of ORU, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Response.

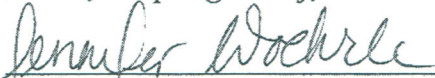
5. It is part of my job responsibility with ORU to: (A) review customer accounts with ORU; (B) address credit issues with ORU's customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting eight (8) post-petition invoices issued by ORU to the Debtors totaling \$7,651.38. Exhibit "A" reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, and (v) invoice due date.

7. ORU has not received payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
and correct to the best of my knowledge, information, and belief.

Executed this 17 day of April 2020, at Spring Valley, New York.



Jennifer Woehrle

EXHIBIT "A" Orange and Rockland

| Last 4 | # | ST | CITY | ST | ZIP | Acct Open | Bill Date | Billing Dates | Amount | Payment | Bill Due |
|--------|------|-----------------|----------------|----|-------|-----------|-----------|-----------------------|------------|---------|-----------|
| 3039 | 2543 | PALISADES-CTR | WEST NYACK | NY | 10994 | 3/11/2020 | 4/16/2020 | 3/11/2020 - 3/31/2020 | \$3,173.94 | \$0.00 | 5/11/2020 |
| 3027 | 23 | CENTRE | CENTRAL VALLEY | NY | 10917 | 3/11/2020 | 4/14/2020 | 3/11/2020 - 4/14/2020 | \$1,100.36 | \$0.00 | 5/11/2020 |
| 0026 | 470 | ROUTE-211 E | MIDDLETOWN | NY | 10940 | 3/11/2020 | 4/15/2020 | 3/11/2020 - 4/10/2020 | \$2,279.38 | \$0.00 | 5/11/2020 |
| 9065 | 75 | INTERSTATE-SHOP | RAMSEY | NJ | 07446 | 3/11/2020 | 4/14/2020 | 3/11/2020 - 4/06/2020 | \$70.45 | \$0.00 | 5/11/2020 |
| 1022 | 108 | ROCKLAND | NANUET | NY | 10954 | 3/11/2020 | 4/15/2020 | 3/11/2020 - 4/10/2020 | \$411.02 | \$0.00 | 5/11/2020 |
| 1025 | 102 | ROCKLAND | NANUET | NY | 10954 | 3/11/2020 | 4/14/2020 | 3/11/2020 - 4/10/2020 | \$21.84 | \$0.00 | 5/11/2020 |
| 1018 | 110 | ROCKLAND | NANUET | NY | 10954 | 3/11/2020 | 4/15/2020 | 3/11/2020 - 4/10/2020 | \$33.96 | \$0.00 | 5/11/2020 |
| 4047 | 75 | INTERSTATE-SHOP | RAMSEY | NJ | 07446 | 3/11/2020 | 4/15/2020 | 3/11/2020 - 4/06/2020 | \$560.43 | \$0.00 | 5/11/2020 |

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| Kate R. Buck James A. Kellar McCARTER & ENGLISH, LLP 100 Mulberry Street Newark, New Jersey 07102 (973) 622-4444 kbuck@mccarter.com , jkellar@mccarter.com | |
| <i>Counsel for NStar Electric Company, Eastern Massachusetts, Consolidated Edison Company of New York, Inc., Orange and Rockland Utilities, Inc., PECO Energy Company, The Potomac Electric Power Company, Delmarva Power & Light Company, Atlantic City Electric Company, Potomac Edison Company, Jersey Central Power & Light Company, Boston Gas Company, KeySpan Energy Delivery Long Island, KeySpan Energy Delivery New York, Massachusetts Electric Company, Public Service Electric and Gas Company and Baltimore Gas and Electric Company</i> | |
| In re: | Chapter 11 |
| MODELL'S SPORTING GOODS, INC., <i>et al.</i> , | Case No. 20-14179 (VFP) |
| Debtors. | Jointly Administered |
| | Honorable Vincent F. Papalia |

**DECLARATION OF LISA R. HOLLAND IN SUPPORT OF RESPONSE OF CERTAIN
UTILITY COMPANIES TO THE ORDER TEMPORARILY SUSPENDING THE
DEBTORS' CHAPTER 11 CASES PURSUANT TO 11 U.S.C. §§ 105 AND 305**

I, Lisa R. Holland declare as follows:

1. I am a Business Analyst for PECO Energy Company ("PECO") and I have been in

that position for 15 years and with PECO for 37 years. In my current position with PECO, I assist in the credit and bankruptcy operations.

2. Except as otherwise stated, all facts contained within this Declaration are based upon personal knowledge, my review of PECO's business documents, correspondence and relevant documents, or my opinion based upon my experience concerning the operations of PECO. If called upon to testify, I would testify to the facts set forth in this Declaration.

3. On behalf of PECO, I submit this Declaration in support of the *Response of Certain Utility Companies To the Order Temporarily Suspending the Debtors' Chapter 11 Cases Pursuant to 11 U.S.C. §§ 105 and 305* (the "Response").

4. In making this Declaration, I am familiar with the contents of the Application.

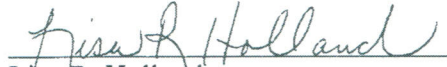
5. It is part of my job responsibility with PECO to: (A) review customer accounts with PECO; (B) address credit issues with PECO's customers; and (C) address issues concerning customers that file for bankruptcy protection, including payment of post-petition invoices.

6. Attached hereto as Exhibit "A" is a chart reflecting sixteen (16) post-petition invoices issued by PECO to the Debtors totaling \$3,637.81. Exhibit "A" reflects (i) redacted post-petition account numbers, (ii) service addresses, (iii) the post-petition service period for each invoice, (iv) invoice amount, (v) invoice due date, (vi) whether the invoice was paid.

7. PECO has not received payment for any of the post-petition invoices set forth in Exhibit "A."

I declare under penalty of perjury pursuant to 28 U.S.C. § 1746 that the foregoing is true
and correct to the best of my knowledge, information, and belief.

Executed this 22 day of April 2020, at Philadelphia, Pennsylvania.



Lisa/R. Holland



PECO